

Friends of the Frank J Wood Bridge (The Friends)
10 Pleasant Street
Topsham, ME 04086

Cheryl Martin
Assistant Division Administrator
Federal Highway Administration – Maine Division
40 Western Ave
Augusta, ME 04330

02/16/2018

Comments: Frank J. Wood Bridge Individual-Eligibility for National Register of Historic Places

Dear Ms Martin,

Please place the below comments in the permanent record of the Section 106 process. The determination of the Frank J. Wood Bridge as individually eligible for the National Register of Historic Places emphasizes the importance of preserving this landmark for future generations. Although the Section 106 process gives equal protection to both contributing resources in a historic district and individually eligible resources, the significance of the bridge being individually eligible is an indication of a higher level of significance to the community and the state. This higher significance should carry weight in your final recommendation.

Please also note for the record, that the Frank J. Wood Bridge was placed on Maine Preservation's Most Endangered List for 2017. This list identifies the most important currently threatened historic resources in Maine. Inclusion of this list is further evidence of the significance of this historic structure and the role it has played in the history of Maine. The Frank J. Wood Bridge was named to the Most Endangered List because it is a valuable historic resource that can and should be preserved.

Updated Inventory Survey

Several Section 106 parties, including Mary Ann Naber of the Advisory Council on Historic Preservation, The Friends of the Frank J. Wood Bridge, and others have requested that the historic bridge inventory of existing bridges in Maine be updated from the last survey of 2002. Without an updated survey it is impossible to fully assess how important the Frank J. Wood Bridge is in the overall inventory. Is it one of the last ones? Rare surviving examples of even common designs are typically recognized as having higher significance. The weight of how much significance is being destroyed with the removal of this bridge cannot be fully gauged without this knowledge.

Although a brief update was provided, the methodology was different from that used for the 2002 survey – using Warren truss bridges rather than Steel Through-Truss bridges (V-9 and V10 in the appendix of the report). This is an important distinction because the lay person can easily recognize a steel through-truss bridge but cannot define what a Warren truss is. The methodology used inflates the total numbers of existing bridges comparable to the Frank J.

Wood Bridge to appear larger than it is. The Friends again requests the updating of the appendix of the 2002 survey of Steel Through-Truss Bridges (V-9 and V10).

Independent Engineering Report

The Preliminary Design Report (PDR) was repeatedly requested by The Friends starting at the first public meeting in April of 2016 and not released until August of 2017. The Friends, Mary Ann Naber, and others asked for an independent engineering review of the feasibility and cost of fully rehabbing the bridge early in the public Section 106 process. The concern behind this request was the lack of experience with historic bridge rehabilitation by the engineering consulting firm hired by MDOT for the project. This request was ignored. Lacking an independent engineering analysis of rehabilitation options, the PDR was critical to understanding the decision-making process underway at MDOT and FHWA. MDOT repeatedly stated that the PDR was not available “yet.”

Through a Freedom of Information Request made to MDOT, The Friends were able to see that there were drafts of the PDR available a full year before it was finally released and, more importantly, that at least one member of the public was provided with a copy of the draft, but that Federal Highway blocked the release to the Section 106 consulting parties. The Friends request an explanation of why the earlier drafts were withheld from consulting parties supporting rehabilitation but provided to an individual supporting demolition.

Most importantly, comparing the earlier drafts to the released PDR, there are vast differences in methodology on life cycle costs and wording around the feasibility of rehab.

At odds with the earlier drafts, the PDR ultimately made the flawed case that the life cycle costs of rehabilitation are significantly higher than a new bridge – apparently based on the same information that had previously indicated otherwise.

Documentation obtained through the Freedom of Information Request shows that the preliminary study of the bridge, from September of 2015+/- through August 2017 cost more than six-hundred-thousand dollars. Federal guidelines put the average cost for this work in the one-hundred-thirty-thousand dollar range. It appears a large amount of the over-run was spent to support the efforts of the “local” design advisory committee that MDOT repeatedly stated they had not requested and had no role in. MDOT staff and their consulting engineer attended most, if not all, of the meetings of this group and provided consulting and design services to them. At the same time, The Friends and ACHP were told that there was no money in the budget for an independent engineering firm with historical bridge rehabilitation experience to do an independent report analysis on the feasibility and cost on of rehabilitation options and life cycle costs.

As a result of this refusal to respond to the requests of several consulting parties, specifically the ACHP and The Friends, The Friends has had to independently raise the money to finance such a study from an engineer with extensive experience in the rehabilitation of historic truss bridges. While MDOT and FHWA spent tens-of-thousands of dollars on a committee to decorate a new bridge that does not need to be built, the local residents of The Friends of the Frank J. Wood Bridge organization and many of the 1200 supporters of rehabilitation on the Friends Facebook page have raised the money for this engineering report. It needs to be noted for the record that it is unconsciously upper handed, unfair, and contrary to the Historical Preservation

Act of 1966 when the public is forced to pay for what the Lead Federal Agency on the Section 106 process is required to provide; a fair and comprehensive analysis of all the alternatives.

Flawed Process

The execution of this Section 106 Process has been flawed from the beginning. MDOT announced in an April 2016 public meeting that their preferred alternative was a new build. This decision was made well before the Section 106 began, well before any 106 consulting parties were notified or held a meeting, and well before the alternatives were defined and studied. In fact, as this letter documents, consulting parties are still waiting on requested updates to surveys and on independent engineering feasibility study.

The Section 106 process appears to have been viewed as a mere formality by MDOT and the Maine office of the Federal Highway Administration. A “check box” they were used to checking quickly as they moved ahead with decisions made before the “review” process had begun. It was clearly a surprise and a pain in their view when the public actually attended and demanded that the procedure set out in law be followed. Internal emails show both higher ups in MDOT and Federal Highway questioned the right of national historical bridge experts to be consulting parties “because they were not from Maine” and had to ask other Federal Highway departments if this was acceptable. The answer, of course, is that involvement by groups with an interest in historic resources a normal an expected part of the Section 106 process. In fact, it is the point of the Section 106 process. This small example just clearly shows the almost complete lack of understanding of the Section 106 process in Maine by the governmental parties entrusted to oversee it. It is vastly clear that the Section 106 process has been skewed to arrive at the preferred outcome of a new bridge, and every disingenuous claim to the contrary made by MDOT and FHWA is countered by dozens of documents obtained through the Freedom of Information Act request made by The Friends.

It is through the persistent pressuring and research of one of The Friends’ members that the Frank J. Wood Bridge’s individually National Register eligibility was determined. MDOT’s historic consultants have continually ignored and brushed aside relevant information and have made ludicrous claims to avoid having this determination. The best example of which is trying to claim that the historic significance of the “crossing” in some manner out-weighs the historic significance of the bridge. The Frank J. Wood Bridge is the existing bridge, in this moment of time, and can be reasonably and feasibly preserved for generations to come. There is no debate on the Frank J. Wood Bridge having historical significance. This is a fact. Attempting to undermine this fact brings into question the degree to which MDOT is dictating to the historic consultants who were/are hired to look into the significance of the bridge. It also begs the question why did they not come to the ultimate conclusion that the bridge is individually eligible? The Maine Historic Preservation Commission alone among government agencies involved in this process has attempted to fairly assess the historic value of the Frank J. Wood Bridge, as their own repeated requests for an updated state-wide bridge survey to provide a foundation for understanding the state-wide context for the bridge went ignored for more than a year.

MDOT, although publicly changing their tune in August of 2016 and saying no preferred alternative had been chosen (after clearly saying one *had* been chosen in the April 2016 public meeting), commissioned and attended a new bridge advisory committee made up of favorable members of both communities and chaired by a former MDOT employee. Several of The Friends spoke to Cheryl Martin of FHWA in the August 2016 Section 106 meeting raising

MDOT's involvement in this committee as a concern, given that they had recently announced that no decision had been made on rehab vs new build. Ms. Martin stated that it was premature and inappropriate for MDOT to be supporting the creation of this committee and attending its meetings. However MDOT and TyLin attended the monthly meetings for over a year and spent countless hours and resources on answering questions and providing numerous renderings for the "new" bridge committee. Even after several requests both in Section 106 meetings and in written comments there has yet to be made public *one* rendering of restored and painted Frank J Wood Bridge.

In addition the Bridge Advisory Committee and MDOT came to several agreements on the design, width and style of the new bridge that add significant cost (in the millions) to that alternative. These costs have not been added into the PDR or the cost break down in the list of alternatives provided to the Section 106 consulting parties and available on MDOT's website for the public to view. This has created a false narrative that provides the public no way of truly comparing alternatives. These additional costs were also purposely left out of the last public meeting even though they were known. FOIA documents show that it was discussed internally whether to include them in the public information, and the decision was to withhold information that did not help make the case for a new bridge.

To further this, there have been no scheduled Section 106 meetings for over a year, even though the bridge's individual National Register eligibility has been in debate and it was recently deemed to be individually eligible.

The Section 106 and 4f reviews give equal recognition to both individually eligible resources and resources that contribute to a district. Yet, in the latest version of the PDR, MDOT points out several times that the bridge is NOT individually eligible as if that makes its demolition less of a concern. Why do they state-it repeatedly, why do they highlight it in the PDR, if not to make a case that the bridge is somehow less significant and worthy of preservation? Using the logic of MDOT's own argument in the PDR, that the Frank J. Wood Bridge would be more worthy of preservation if it was individually eligible for the National Register of Historic Places, The Friends agrees that it is more worthy of preservation now that it has been determined individually eligible for the National Register.

Sincerely,

John Graham
President of the Friends of the Frank J. Wood Bridge